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OF THE STATE OF WASHINGTON

2009 JUL -6 P 4:29
BY RONALD R. CARPENTER
NO. 81487-2

CLERK

SECOND
STATEMENT OF
ADDITIONAL
AUTHORITIES

LAURA HOLDEN,

Petitioner,

vs.

FARMERS INSURANCE COMPANY OF
WASHINGTON, a domestic insurer;
FARMERS INSURANCE EXCHANGE, a
foreign insurer; and all affiliated Farmers
Insurance Companies, and/or entities,

Respondents.

COME NOW the respondents and submit the following additional
authorities to the Court pursuant to RAP 10.8:

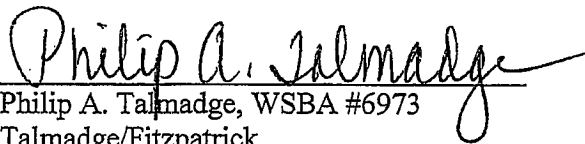
- CP 368-69 (methodologies employed by Farmers to estimate fair market value);
- CP 246 (under Farmers' policy, if Farmers and the insured cannot agree on value, the parties may seek the appointment of competent and disinterested appraisers);
- CP 447-70, 483-92 (Farmers' treated loss paid on the basis of ACV and loss paid on the basis of replacement cost alike in that it never paid anything toward the sales tax unless the insured actually repaired or replaced the item that was damaged or lost).

ORIGINAL

FILED AS
ATTACHMENT TO EMAIL

DATED this 6th day of July, 2009.

Respectfully submitted,



Philip A. Talmadge, WSBA #6973
Talmadge/Fitzpatrick
18010 Southcenter Parkway
Tukwila, Washington 98188-4630
(206) 574-6661

Jeffrey A. Rosenfeld, CA Bar #13696
admitted *pro hac vice*
Danielle S. Fitzpatrick, WSBA #37189
R. Omar Riojas, WSBA #35400
DLA Piper LLP (US)
1999 Avenue of the Stars, 4th Floor
Los Angeles, CA 90067-6022
(310) 595-3000

Danielle S. Fitzpatrick, WSBA #37189
R. Omar Riojas, WSBA #35400
DLA Piper US LLP
701 Fifth Avenue, Suite 7000
Seattle, WA 98104-7044
(206) 839-4800
Attorneys for Respondents Farmers
Insurance Company of Washington and
Farmers Insurance Exchange

DECLARATION OF SERVICE

On this day said forth below, I emailed and deposited with the U.S. Postal Service a true and accurate copy of: Second Statement of Additional Authorities in Supreme Court No. 81487-2 to the following parties:

Jeffrey A. Rosenfeld
DLA Piper Rudnick Gray Cary US LLP
1999 Avenue of the Stars, 4th Floor
Los Angeles, CA 90067-6022

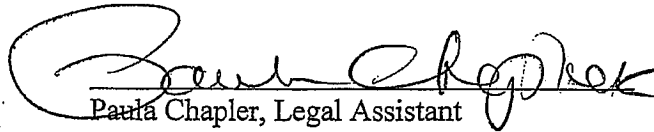
Danielle S. Fitzpatrick
R. Omar Riojas
DLA Piper US LLP
701 Fifth Avenue, Suite 7000
Seattle, WA 98104-7044

Brad J. Moore
Stritmatter Kessler Whelan Coluccio
200 2nd Avenue W
Seattle, WA 98119-4204

Original sent by email for filing with:
Washington Supreme Court
Clerk's Office
415 12th St. W.
Olympia, WA 98504

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

DATED: July 6, 2009, at Tukwila, Washington.


Paula Chapler, Legal Assistant
Talmadge/Fitzpatrick

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DECLARATION

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OFFICE RECEPTIONIST, CLERK

To: Paula Chapler
Subject: RE: Holden v. Farmers

Rec. 7-6-09

From: Paula Chapler [mailto:paula@tal-fitzlaw.com]
Sent: Monday, July 06, 2009 4:21 PM
To: OFFICE RECEPTIONIST, CLERK
Subject: Holden v. Farmers

Per Mr. Talmadge's request, please see the attached for filing in the following case:

Case Name: Laura Holden v. Farmers Insurance Company, et al.
Cause No. 81487-2
Attorney: Philip A. Talmadge, WSBA #6973
Talmadge/Fitzpatrick
18010 Southcenter Parkway
Tukwila, WA 98188
(206Z) 574-6661

Thank you for your prompt attention to this matter.

Sincerely,

Paula Chapler
Legal Assistant
Talmadge/Fitzpatrick